

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/13/2022	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA	
Company Name:	Morrell Plating, Inc.	
Facility Name:	Morrell Plating	
Facility Physical Location:	2712 Anson Rd	
(city, state, zip code)	Dallas, TX 75235	
Mailing address:	same	
(city, state, zip code)	same	
County/Parish:	Dallas	
Facility Phone Number	(214) 357-9850	
Facility Contact:	James Morrell	Owner
	james@morrellplating.com	
FRS Number:	110000821656	
Identification/Permit Number:	n/a	
Media Identifier Number:	TXD007319866	
NAICS:	332813 - ELECTROPLATING, PLATING, POLISHING, ANODIZING, AND COLORING	
SIC:	n/a	
Personnel participating in inspection:		
John Penland	EPA R6/ECD-SR	Lead Inspector
A.D. Talton	EPA R6/ECD-SR	Senior Inspector
Erin Young-Dahl	EPA R6/ECD-SR	Inspector
Sandesh Thapa	EPA R6/ECD-SR	Inspector
James Morrell	Morrell Plating, Inc.	Owner
EPA Lead Inspector Signature/Date		
	John Penland – Lead Inspector	Date
Supervisor Signature/Date		
	Jeff Yurk – Section Chief	Date

Section I – INTRODUCTION**PURPOSE**

On 09/13/2022, I, John Penland, conducted an unannounced inspection of the Morrell Plating facility (Morrell) located at 2712 Anson Rd in Dallas, Texas. The inspection centered on compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted by Environmental Protection Agency (EPA) inspectors Adolphus Talton, Erin Young-Dahl, and Sandesh Thapa. The inspection included a walkthrough of the facility's production process and waste generation and management units as well as a review of facility records related to hazardous waste management.

The Morrell facility was targeted for inspection as follow-up to a previous investigation which had concerns over hazardous waste determinations and reported generator status.

This report serves as documentation of all onsite activities and observations during the inspection of the Morrell facility. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

The Morrell facility was issued the EPA ID# TXD007319866. During the inspection, Morrell is operating as a Large Quantity Generator (LQG) of hazardous waste and has done so since 07/14/2021.

The Morrell facility offers electroplating services, including zinc plating on carbon steel, black oxide coating on steel or stainless steel, and stainless steel passivation. Morrell formerly performed nickel plating but has since focused exclusively on zinc plating. The facility operates weekdays from 8 a.m. to 5 p.m. and employs fewer than 10 full-time employees.

Section II - OBSERVATIONS

Adolphus Talton, Erin Young-Dahl, Sandesh Thapa, and I conducted the onsite inspection during normal business hours on 09/13/2022, during which the Morrell facility was conducting normal operations, and all areas of the facility were in use.

This section provides an abbreviated description of our daily activities. No photographs were taken during the inspection. Unless otherwise specified, the statements cited in this section reflect those claims made by facility personnel or documents reviewed during the inspection.

I, John Penland, along with Adolphus Talton, Erin Young-Dahl, and Sandesh Thapa, entered the facility at 0950 hrs., presented credentials to Mr. James Morrell (Owner), and informed him that we were there to conduct an inspection of the facility under the authority of Section 3007 of RCRA. I explained the right of Morrell to assert a Confidential Business Information claim for records requested by the EPA, followed

by a presentation of EPA Region 6's Confidentiality Notice (40 C.F.R. Section 2.203). I then facilitated an opening briefing at 1000 hrs. with James Morrell.

Following the opening briefing, we conducted a walkthrough of the Morrell facility production and associated waste management areas, accompanied by James Morrell. The facility walkthrough began at the electroplating and stripping line. Overall, the facility seemed in poor condition due to corrosion from sulfuric acid vapors and weathering.

Rack Electroplating Area

We observed the rack electroplating process, which involves dipping the initial carbon steel parts into a series of tanks to abrade the outer imperfections, then chemically bond zinc onto the substrate. Tank contents include water, caustics (sulfuric acid) and alkaline solutions for the pickling process, and the zinc plating bath. I observed this process from a wooden catwalk next to the tanks and detected airborne irritants while next to the plating bath.

Material buildup was present at the edges of the tanks, and I was told this residue was deposited as drag-out from the transfer of parts between baths. On the floor in the same room, we observed unaddressed spills of plating bath solutions and drag-out from the plating line. I noticed black oxide sludge accumulating in open process tanks numbered 49 through 53, all of which are out of service.

Barrel Electroplating Area

We observed the barrel electroplating area used for the zinc plating of small parts. At the time of the inspection, the process line, which included the same zinc plating baths as the rack electroplating line, were in operation. The baths were contained within barrels that each had a volume of less than 55 gallons. I had no concerns to report.

Wastewater Neutralization Area

Wastewater from the cleanout of plating baths and rinse tanks accumulates and is neutralized in large tanks prior to discharge to the Dallas city water system under the free treatment program. The facility puts precipitates through a filter press and sludge drier. Based on lab analysis provided by Mr. Morrell, the tank bottoms are non-hazardous.

Section III – AREAS OF CONCERN

I observed no areas of concern applicable to RCRA regulations during the inspection. The RCRA Listed waste code F006 does not apply to this facility's electroplating processes (40 C.F.R. § 261.31).

Section IV – FOLLOW UP

The EPA received analytical documentation of the non-hazardous determination of the tank bottoms and related TSDf acceptance notifications from Republic Services.

Section V – LIST OF APPENDICES

No appendices attached.